



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

SEP 29 2016

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Article Number: 7015 3010 0000 7503 8730

Mr. Jay Schneiderman, Supervisor
Town of Southampton
116 Hampton Road
Southampton, NY 11968

Re: **Request for Information**
Docket No. CWA-IR-16-033
EPA Audit Report – July 7-9, 2015
Town of Southampton Municipal Separate Storm Sewer System
SPDES No. NYR20A454

Dear Supervisor Schneiderman:

Please find the following Request for Information (“RFI”), which the U.S. Environmental Protection Agency (“EPA”) Region 2 is issuing to the Town of Southampton (the “Town”) pursuant to Section 308(a) of the Clean Water Act (“CWA”), 33 U.S.C. §1318(a). The EPA is issuing the RFI to require the Town to provide specific information regarding the findings of the enclosed audit report.

Section 308(a) of the CWA, 33 U.S.C. §1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether or not a person/agency is in violation of Section 301 of the CWA, 33 U.S.C. §1311 or carrying out section 402 of the CWA, 33 U.S.C. §1342, the EPA shall require the submission of any information reasonably necessary to make such a determination. Under the authority of Section 308 of the Clean Water Act, EPA may require the submission of information necessary to assess any facility/site and its related appurtenances for carrying out the provisions of the CWA.

On July 7-9, 2015, EPA conducted an audit of the Town’s Municipal Separate Storm Sewer System (“MS4”). The purpose of the audit was to evaluate the Town’s compliance with the New York State Department of Environmental Conservation (“NYSDEC”) State Pollutant Discharge Elimination System (“SPDES”) MS4 General Permit (the “Permit”). The enclosed audit report details findings from the audit and lists potential non-compliance items, which are directly linked to Permit requirements, as well as areas of concern, which are items that should be addressed by the Town to facilitate a more comprehensive stormwater management program.

REQUEST FOR INFORMATION

The Town of Southampton is hereby required, pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. §1318(a), to submit the following information regarding its MS4:

1. A written response (including supporting documentation and photographs, where applicable) describing the actions that the Town has taken or will take to address each of the potential non-compliance items (Part D) and areas of concern (Part E) in the enclosed audit report;
 - i. Specifically, for item D.5, please submit a consolidated, up-to-date, post-construction stormwater management practice inventory that includes, at a minimum, the types of practices and information required by Part VII.A.5.a.vi of the Permit. Please also indicate whether the practice discharges or has the potential to discharge to surface waters via the MS4, as well as the owner of each practice.
2. The number of drainage structures located within storm sewersheds (that have the potential to discharge to surface waters) with accompanying mapping; and
3. A copy of all sections of the Stormwater Management Program ("SWMP") Plan (including SWMP Plan attachments) that have been modified or added by the Town since the audit or in response to this RFI.

Please submit the requested information on or before **sixty (60) calendar days** of receipt of this RFI.

CERTIFICATION

Any documents to be submitted by Town as part of this Request for Information shall be sent by certified mail or its equivalent and shall be signed by an authorized representative of the respective entity (see 40 CFR §122.22), and shall include the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

All information required to be submitted pursuant to this RFI shall be sent by certified mail or its equivalent to the following addresses:

Douglas McKenna, Chief
Water Compliance Branch
Division of Enforcement and Compliance Assistance
U.S. Environmental Protection Agency – Region 2
290 Broadway, 20th Floor
New York, NY 10007-1866

Joseph DiMura, P.E., Director
Bureau of Water Compliance Programs
Division of Water, NYSDEC
625 Broadway
Albany, NY 12233

Should you have any questions regarding this request, feel free to have your staff contact Justine Modigliani, P.E., Compliance Section Chief, at (212) 637-4268, or they may contact Ms. Katherine Mann of my staff at (212) 637-4226.

Sincerely,



Douglas McKenna, Chief
Water Compliance Branch
Division of Enforcement and Compliance Assistance

Enclosure

cc: Joseph DiMura, P.E, Director, Bureau of Water Compliance Programs, NYSDEC
w/enclosure
Ryan Porciello, NYSDEC Region 1 w/enclosure (via email)

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

[illegible]

Section B: Facility Data

<p>Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)</p> <p>Town of Southampton MS4 116 Hampton Road Southampton, NY 11968</p>	<p>Entry Time/Date</p> <p>10:00 AM/7-7-15</p> <p>Exit Time/Date</p> <p>2:00 PM/7-9-15</p>	<p>Permit Effective Date</p> <p>5/1/2015</p> <p>Permit Expiration Date</p> <p>4/30/2017</p>
<p>Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)</p> <p>Ms. Christine Fetten, P.E., Director of Municipal Works, Stormwater Management Officer; Mr. Alex Gregor, Superintendent of Highways; Mr. Kyle Collins, AICP, Dept. of Land Management; Mr. Francis Zappone, Deputy Supervisor; Ms. Anna Throne-Holst, former Town Supervisor; and others - see audit report</p>	<p>Other Facility Data (e.g., SIC NAICS, and other descriptive information)</p> <p>SIC Code 4952: Sewerage Systems</p>	
<p>Name, Address of Responsible Official/Title/Phone and Fax Number</p> <p>Mr. Jay Schneiderman, Supervisor Town of Southampton 116 Hampton Road Southampton, NY 11968</p>	<p>Contacted</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	

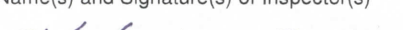

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/>	Permit	<input type="checkbox"/>	Self-Monitoring Program	<input type="checkbox"/>	Pretreatment	<input checked="" type="checkbox"/>	MS4
<input checked="" type="checkbox"/>	Records/Reports	<input type="checkbox"/>	Compliance Schedules	<input checked="" type="checkbox"/>	Pollution Prevention		
<input checked="" type="checkbox"/>	Facility Site Review	<input type="checkbox"/>	Laboratory	<input checked="" type="checkbox"/>	Storm Water		
<input type="checkbox"/>	Effluent/Receiving Waters	<input type="checkbox"/>	Operations & Maintenance	<input type="checkbox"/>	Combined Sewer Overflow		
<input type="checkbox"/>	Flow Measurement	<input type="checkbox"/>	Sludge Handling/Disposal	<input type="checkbox"/>	Sanitary Sewer Overflow		

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
<input type="text" value="B"/> <input type="text" value="0"/> <input type="text" value="M"/> <input type="text" value="1"/> <input type="text" value="7"/>	WW Storm Water MS4 - Failure to develop adequate SWMP
<input type="text" value="B"/> <input type="text" value="0"/> <input type="text" value="M"/> <input type="text" value="1"/> <input type="text" value="8"/>	WW Storm Water MS4 - Failure to Implement SWMP
<input type="text" value="B"/> <input type="text" value="0"/> <input type="text" value="M"/> <input type="text" value="4"/> <input type="text" value="1"/>	WW Storm Water MS4 - Failure to Maintain Records
<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
 Katherine Mann, Physical Scientist	USEPA R2/DECA-WCB/212-637-4226 (p), 212-637-3953 (f)	9/9/2016
 Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
Justine Modigliani, P.E., Chief, Compliance Section	USEPA R2/DECA-WCB/212-637-4268 (p), 212-637-3953 (f)	9/29/16

INSTRUCTIONS

Section A: National Data System Coding (*i.e.*, PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=*unpermitted*, G=*general permit*, etc.. (*Use the Remarks columns to record the State permit number, if necessary.*)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A	Performance Audit	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	{	Storm Water-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Storm Water-Construction-Non-Sampling
F	Pretreatment (Follow-up)	\$	Combined Sewer Overflow-Non-Sampling	:	Storm Water-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Storm Water-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Storm Water-MS4-Sampling
J	Complaints	\	CAFO-Sampling	-	Storm Water-MS4-Non-Sampling
M	Multimedia	=	CAFO-Non-Sampling	>	Storm Water-MS4-Audit
N	Spill	2	IU Sampling Inspection		
O	Compliance Evaluation (Oversight)	3	IU Non-Sampling Inspection		
P	Pretreatment Compliance Inspection	4	IU Toxics Inspection		
R	Reconnaissance	5	IU Sampling Inspection with Pretreatment		
S	Compliance Sampling	6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics with Pretreatment		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A	State (Contractor)	O	Other Inspectors, Federal/EPA (Specify in Remarks columns)
B	EPA (Contractor)	P	Other Inspectors, State (Specify in Remarks columns)
E	Corps of Engineers	R	EPA Regional Inspector
J	Joint EPA/State Inspectors—EPA Lead	S	State Inspector
L	Local Health Department (State)	T	Joint State/EPA Inspectors—State lead
N	NEIC Inspectors		

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

**Municipal Separate Storm Sewer System (MS4) Audit
Town of Southampton (NYR20A454)
July 7, 2015 through July 9, 2015**

Prepared by:

**United States Environmental Protection Agency - Region 2
290 Broadway
New York, New York 10007**

Town of Southampton MS4 Audit
July 7, 2015 – July 9, 2015

LaRosa typically take photographs every time they visit a site. During the Audit, the Town stated that it had not been tracking inspections at construction sites in a master file but is doing so now. The Town provided the SWPPP inspection master file to EPA prior to the Audit, which includes site-specific inspection and enforcement data dating back to 2010. The file lists the project name, hamlet, type of project, date of inspection(s) and notes such as whether the site had been issued a formal enforcement action. At the time of the Audit, Ms. Fetten, Mr. LaRosa and Mr. Collins had all conducted inspections on behalf of the Town (all three individuals are P.E.s). Ms. Fetten was also following-up to any construction stormwater related deficiencies observed by building inspectors while they were on site. Ms. Fetten stated that she was working to get building inspectors trained with the NYSDEC 4-hour erosion and sediment control training. Inspection and enforcement procedures are included in the SWMP Plan appendix document for MCMs 4 and 5, which also includes a copy of the NYSDEC Construction Stormwater Inspection Manual.

Deficiencies identified during inspections are communicated verbally to the developer at the time of the inspection (if on site). Otherwise, the inspection report is scanned and emailed to the developer, with direction to take care of the deficiencies and report back to the Town. Ms. Fetten stated that usually a verbal threat of a Stop Work Order adequately conveys the importance to the developer to remedy deficiencies. The Town recalled letters that had been issued to two (2) sites from the Town attorney's office; there had been few formal Stop Work Orders.

At the completion of a project, the Town goes to the site to make sure it is fully stabilized. Ms. Fetten stated that for sites with post-construction stormwater management practices, covenants and restrictions (C&Rs) must be in place that require the property owner to adequately maintain post-construction controls before the MS4 acceptance statement on the NOT is signed. This is discussed in further detail in the post-construction section, below.

During the Audit, Town representatives stated that if a member of the public wants to report an issue concerning a construction site to the Town, there is phone and email reporting available through the Environmental Division and Code Enforcement. Town representatives thought that Code Enforcement keeps a log of the calls they received but didn't know how they classified them. If Code Enforcement were to issue a Notice of Violation, Ms. Fetten would do the follow-up. Ms. Fetten also stated that she keeps an electronic file for miscellaneous construction sites and would save information related to complaints there (for sites without existing files).

Town representatives stated that there are not a lot of NYSDEC 4-hour erosion and sediment control trainings held on Long Island, but when there is an upcoming training, the Town sends a notice to general contractors they work with to let them know of course availability. The Town also provides the previously mentioned pamphlet on CGP requirements at its engineering offices. Town representatives stated that they ensure that operators have received erosion and sediment control training before they do work in the Town's jurisdiction either at the pre-construction meeting (for subdivisions), or by checking that the 4-hour training card is kept in the construction trailer. Ms. Fetten also stated that the Town asks to see the inspection book while on site to see the quality of the weekly inspections, and to ensure they are being performed by a qualified inspector. EPA noted during review of documentation post Audit that the Town's SWMP Plan states that proof of erosion and sediment control training for all listed construction site contractors must be provided prior to the Town signing off on the MS4 acceptance form.

Town of Southampton MS4 Audit
July 7, 2015 – July 9, 2015

Prior to the Audit, the Town provided EPA with an inventory of approximately 67 active sites within its jurisdiction (the list included 91 sites, 24 of which had filed an NOT). Among other things, the inventory included the project name, type of project (single family home, subdivision, etc.), SWPPP preparer, SWPPP MS4 acceptance date, NOI acknowledgement date, SPDES number, post-construction C&R date, and NOT date. Owner/operator contact information is maintained in the file for each site.

Post-Construction Stormwater Management

As previously mentioned, the Town adopted local law Chapter 285: Stormwater Management and Erosion and Sediment Control on December 14, 2010, which includes post-construction requirements. During the Audit, the Town had inventoried 115 infiltration basins and 1 open channel in GIS. Town representatives stated that the highway department does inspections and maintenance of Town-owned infiltration basins. The Highway Department superintendent estimated that the Town cleans about 10% of the basins each year. Town representatives stated that they take a reactionary approach for practices governed by C&Rs. As previously mentioned, the Town requires that C&Rs are in place requiring maintenance of post-construction stormwater management practices prior to signing the MS4 acceptance statement on the NOT. This practice has been in place since 2008. In the event a property owner did not carry out the inspection and maintenance requirements in the C&R, the Town stated that the Code Enforcement office would take action; however, this scenario has not yet occurred. According to the Town, none of the post-construction stormwater management practices governed by C&Rs flow to the Town's MS4. It was unclear at the time of the Audit which post-construction stormwater management practices included in the Town's GIS inventory actually discharged to the MS4, and whether they were all Town-owned. It was also unclear whether there were additional private post-construction practices installed between March 10, 2003 and 2008 that did not have C&Rs in place and discharged to the Town's MS4 (that were not included in the Town's inventory).

The Town's SWMP Plan includes written operation and maintenance procedures for specific structural BMPs such as dry detention ponds, wet ponds, and filtration practices including grass swales and sand filters, including an inspection schedule. Appendix F of the Town's SWMP Plan includes a list of 10 sites with post-construction C&Rs in place, as well as a list of approximately 275 preservation parcels (including parcels in incorporated villages) and associated owners.

It was not clear based on the list in the SWMP Plan and the infiltration basins in GIS whether the Town had a complete inventory of post-construction stormwater management practices as required by the Permit (discussed in further detail in Potential Noncompliance Items section later in this report).

Town of Southampton MS4 Audit
July 7, 2015 – July 9, 2015

Pollution Prevention and Good Housekeeping for Municipal Operations

Prior to the Audit, the Town provided EPA with an inventory of municipal facilities, which included approximately 80 facilities (note that in numerous instances, multiple facilities are listed separately under the same address). The inventory was included as Appendix G to the Town's SWMP Plan and is updated annually. Among other things, the inventory identifies whether the facility is located on the water front and whether there is an on-site sanitary system. Also included in the SWMP Plan were facility self-assessments and/or summary sheets for the following facilities:

- Conscience Point Marina (summary sheet and self-assessment – 12/30/13)
- Southampton Police Dept., Maintenance Garage & Fire Marshal's Office (summary sheet indicates receiving water body is not applicable)
- Red Creek Park (summary sheet and self-assessment – 8/6/13)
- Shinnecock Commercial Fishing Dock (summary sheet and self-assessment – 12/30/13)
- Southampton Town Recreation Center (SYS) (summary sheet and self-assessment 8/6/13)
- Southampton Town Hall (summary sheet and self-assessment 7/29/13)

Documentation of self-assessments was not available for the other Town-owned facilities/properties at the time of the Audit. During the Audit, it was discussed that the vast majority of the facilities on the Town's inventory drain to groundwater, and stormwater runoff from these facilities does not enter the Town's MS4; however, the Town had not maintained documentation demonstrating this.

During the Audit, Town representatives stated there was stormwater drainage to surface water (via overland flow) from the facility located at 1524 North Sea Road to a wetland located east of the facility. However, due to flood conditions at this location, the Town was in the process of moving operations upland to 1370 Majors Path.

Town operations discussed at the time of the Audit include the following:

- **Deicing:** At the time of the Audit, the Town had three facilities for salt storage located at the Westhampton Transfer Station, 32 Jackson Avenue and at 1524 North Sea Road. The North Sea salt barn was being relocated to/built at the time of the Audit at the 1370 Majors Path facility. None of the three (3) facilities discharge stormwater to the MS4 (although wetlands are located behind the 1524 North Sea Road facility). According to Mr. Alex Gregor, Superintendent of Highways, the Town pretreats between 18 and 25 miles of roadway with brine prior to snow events. The Town then applies a 1:1 sand-salt mix as the snow starts sticking to the ground. Mr. Gregor stated that the Town tries to sweep up the sand in the spring (Town-wide sweeping begins in April).
- **Vehicle Washing:** According to Ms. Fetten, most Town vehicles are washed at a private car washing facility. A copy of an internal 2011 memo to all Town department heads concerning car services provided for all Town fleet vehicles was provided to EPA at the time of the Audit. Mr. Gregor stated that highway department vehicles are washed at the

Town of Southampton MS4 Audit
July 7, 2015 – July 9, 2015

Hampton Bays facilities (Jackson Avenue) where there are no drains (washwater infiltrates to groundwater).

- **Vehicle Maintenance:** Vehicles are maintained indoors at the shops at 1524 North Sea Road, 110 Old Riverhead Road and 20 Jackson Avenue. As previously mentioned, the 1524 North Sea Road site drains overland to wetlands. Stormwater at the other two sites drains to groundwater.
- **Catch Basin Cleaning:** During the Audit, it was discussed that there is a distinction between the number of structures (e.g., catch basins) located within a storm sewershed draining to a surface water body, and the total number of drainage structures (which include “leaching catch basins” that discharge to groundwater) that the Town maintains. While all of the structures within storm sewersheds have been mapped in GIS, structures discharging to groundwater have not (unless they are part of a subdivision, in which case, they are on the subdivision map). Town representatives estimated that between 2,500 and 3,000 drainage structures are maintained by the Town. Mr. Gregor estimated that 600 of the structures are maintained by the Highway Department each year. He was unsure how many are located within storm sewersheds. According to Mr. Gregor, the Highway Department operates two machines starting in April that cover 450 centerline miles of road. He stated that they start with priority structures then get to service requests. Highway Department personnel tracks the catch basins that are cleaned on paper maps; that information then gets uploaded into the PubWorks system. Response to service requests are also tracked electronically through PubWorks software. Mr. Gregor stated that they target major roadways or known low spots for priority areas. Material removed from drainage structures is taken to 32 Jackson Avenue.
- **Street Sweeping:** According to Mr. Gregor, the Town sweeps the entire Town once per year (approximately 900 miles) using six (6) wet sweepers. Materials are taken to 32 Jackson Avenue where they are drained, staged, and eventually screened. Similar to drainage structure cleaning, the Town prioritizes main roads for sweeping followed by service requests.
- **Road Maintenance:** Town representatives stated that the Highway Department performs road work such as filling potholes, hot mix repairs, curbing, etc. but contracts out heavy work. Mr. Gregor stated that they would cover storm drains if there was an accident involving an oil or fuel spill but do not otherwise utilize BMPs to prevent pollutants associated with road work from entering storm drains.
- **Roadkill:** Roadkill is taken to the North Sea Transfer Station at 1370 Majors Path where there is an isolated composting location in the back. Stormwater runoff at the 1370 Majors Path facility drains to a large recharge basin, from which there is no discharge to surface waters.
- **Garbage Removal:** Garbage is removed from Town parks and facilities by the Parks Department, which operates a fleet of 16 solar powered compactors. Dumpsters are emptied 5-7 days per week in the summer and 3 days per week in the winter. All refuse is

Town of Southampton MS4 Audit
July 7, 2015 – July 9, 2015

brought to the North Sea transfer station. The Town also operates a recycling program at its Town facilities; recyclables are also brought to North Sea Recycling (also at 1370 Majors Path). Residents self-haul household garbage to the North Sea transfer station or hire a private carter. The Town has a Solid Waste Management Plan, which was in draft form at the time of the Audit and is included as an appendix to the SWMP Plan. The draft plan incorporates a code change to Chapter 205 (Waste Management), which, among other things, added stormwater controls for garbage trucks.

- **Yard Debris:** The Town does not accept grass clippings but offers a pick-up service in the spring and in the fall for brush. The public can also bring leaves year round to any one of the three (3) registered transfer stations in the Town (Westhampton, Hampton Bays, North Sea). The Town also accepts Christmas trees at its transfer stations.
- **Pet Waste Disposal:** As previously mentioned in this report, the Town has implemented a dog waste bag program at all parks, beaches and at some road ends. Used bags go into trash receptacles, which the Town empties. Town representatives stated that over the past 10 years that the program has been in place, they believe it to be effective as they are actively replenishing bags, in particular on the eastern beaches, and have seen a big decrease in dog waste on beaches.
- **Goose Management:** The Town has a Goose Management Plan, dated 2014, and is included as an appendix to its SWMP Plan. The Town's goose management program was not discussed in detail during the Audit. Town representatives stated that geese are not a big problem.
- **Pesticide, Herbicide, Fertilizer Application:** Town representatives stated during the Audit that they had passed a resolution prohibiting the usage of pesticides or herbicides by the Town on Town properties; it was not clear when this resolution had been passed. The Town fertilizes athletic fields and a select number of ornamental locations (e.g., Town Hall and 140 Louis Road in Quogue). Fertilizers are stored by the Town at the Parks facility at 24 Jackson Avenue. Mr. Jon Erwin, Parks Maintenance Supervisor, stated that they minimize the use of fertilizers by restricting their usage to athletic fields (specifically, 4 soccer fields and 12 baseball fields). One (1) baseball field in Iron Point Park is not fertilized by the Town due to its proximity to the Peconic River. During the Audit, Town representatives stated that they did not have written procedures for fertilizer application (such as where and when and how much is applied, and by whom) but follow the procedures on the product labels.

Prior to the Audit, the Town provided EPA with a summary of stormwater training and meeting attendance over the past 5 years (2011 – 2015). Although the training summary was detailed, EPA noted that most of the trainings and meetings were attended by department heads or management-level individuals, so it was unclear whether municipal staff received training (in particular, pollution prevention / good housekeeping training). During the Audit, Town representatives stated that employee training is largely on-the-job training, a lot of which appeared to be safety related. Mr. Gregor stated that Highway Department staff know to tell management if they see evidence of oil/odors in storm drains. Mr. Erwin stated that the

Town of Southampton MS4 Audit
July 7, 2015 – July 9, 2015

departments also maintain absorbent materials such as booms and pads and instruct staff what to do if they see a spill. Mr. Erwin also added that the Parks Department has a meeting in the shop every spring for seasonal employees. During the Audit, training resources such as those available through the PEP, were discussed. Stormwater pollution prevention training on the staff level was not documented at the time of the Audit.

According to Town representatives, contracted services utilized by the Town include highway repaving, drainage installation, as well as an outside consultant for SWPPP review (when needed). Third party certifications (similar or equivalent to what is outlined in the Permit as Part IV.G) were not in place at the time of the Audit. Town representatives stated that they would ensure that contractors are utilizing BMPs and that the contractors' activities are not a detriment to the Town's compliance with the terms of its MS4 permit by directly overseeing the work that is being performed under the contract or by conducting regular inspections.

Field Observations

During the Audit, EPA visited six (6) municipal facilities, three (3) private construction sites and seven (7) outfalls. EPA's observations related to each of these locations are summarized below in Table 1. Weather conditions on July 8, 2015 were sunny and approximately 80 °F, and weather conditions on July 9, 2015 were overcast and approximately 70 °F. Photographs of the notable observations at each location are included in Attachment 2 – Photograph Log.

Table 1

Name (SPDES Permit No., where applicable)	Location	Notable Observations	Date of Observation
Municipal Facilities:			
	1524 North Sea Road	<ol style="list-style-type: none"> 1. Town representatives stated that there are flooding issues here. The Town hoped to move operations from this location upland and transition the property to a passive park (estimated timeframe for move: October 2015). 2. Materials located outside included coal patch, recycled concrete and recycled asphalt piles. A 550-gallon above ground fuel tank was also located outside on the property. Fuel spills near the tank were not observed on the ground at the time of the Audit. 3. Miscellaneous fuel/oil staining was observed on the ground in some locations. 	7/8/2015

Town of Southampton MS4 Audit
July 7, 2015 – July 9, 2015

		<ol style="list-style-type: none"> 4. 55-gallon drums were stored on spill pallets in the garage. Speedy dry was available on site. 5. No storm drains or direct flow path to surface waters were observed at the time of the Audit; however, wetland vegetation was observed on the property. Wetlands are located east of the Site. 	
	Conscience Point Park	<ol style="list-style-type: none"> 1. Storm drains on site drain to recharge basins. 2. There is a 6000-gallon gasoline tank and 4000-gallon diesel fuel tank on site. The boat fueling area was clean, with no staining or other evidence of spills. Absorbent material was available on site near the dock in the event of a spill. 3. Town representatives stated that boat maintenance is conducted at a different location (24 Jackson Avenue). 4. Hoses were available for rinsing boats – no signage was observed to deter boaters from using soap. The Town representative stated that he has not seen people using soaps but would say something to them if he did. 	7/8/2015
	1370 Major Path Maintenance Garage	<ol style="list-style-type: none"> 1. No floor drains were observed inside the garage. Speedy dry was available and had been applied beneath a vehicle being maintained. 2. Some petroleum products were stored on a spill pallet, whereas one (1) 55-gallon drum and miscellaneous gasoline cans were stored on the garage floor. 3. The garage floor was generally clean with no indicators of major spills. 	7/8/2015
	20 Jackson Avenue HWY Garage and Yard (East Side)	<ol style="list-style-type: none"> 1. Maintenance garage for highway department vehicles. Floor drainage is collected in an underground waste oil tank. 2. There was one small circular floor drain in the shower room – the destination of the floor drain was not clear at the time of the Audit. The Highway Dept. Superintendent stated that he believed 	7/8/2015

Town of Southampton MS4 Audit
July 7, 2015 – July 9, 2015

		<p>all floor drains were cemented shut prior to his time as superintendent.</p> <ol style="list-style-type: none"> Stormwater drainage is to groundwater. No storm drains were observed on site at the time of the Audit with the exception of one dry well located on the north side of the highway garage. Storage in the vicinity of the drywell included a 900-gallon #2 heating oil tank, and 55-gallon drums stored on wooden pallets. No evidence of spills was observed in the area. Batteries were observed outside the highway garage on the ground. An uncovered scrap metal dumpster was observed near the northeast corner of the property, near the animal shelter. 	
	32 Jackson Avenue HWY (West Side): Fueling, Salt Barn and Area for Street Sweeping / Compost Piles	<ol style="list-style-type: none"> A 1000-gallon gasoline tank and 6000-gallon diesel fuel tank are located here (aboveground). A spill kit was not available near the fueling station at the time of the Audit. 1,500-ton salt barn. Some salt and sand were observed on the ground outside the barn; however, no storm drains were observed on the property. Stormwater drainage is to groundwater. According to Town representatives, street sweepers are washed out each day and associated debris is pushed to the west side of the site. Town representatives stated that they were not aware of any surface water bodies in the area that would receive drainage from this operation. Online review of wetland mapping available on the US Fish and Wildlife Service's National Wetland Inventory indicated that there are no wetlands located in the area. Wet material removed from catch basins is deposited in a "lagoon" located on site. 	7/8/2015
	Parks Department at 24 Jackson Avenue	<ol style="list-style-type: none"> Sign maintenance, wood work, and small engine repair conducted here. Very clean. No floor drains were observed at the time of the Audit. 	7/9/2015

Town of Southampton MS4 Audit
July 7, 2015 – July 9, 2015

		<ol style="list-style-type: none"> 2. Leaching pool drainage structures were observed outdoors in the parking lot. 3. Mulch/fertilizer/lime storage area indoors. Other equipment stored under tented area. Lawn mowers stored indoors. 4. Speedy-dry was observed on site. 	
	Police Department and Central Garage at 110 Old Riverhead Road	<ol style="list-style-type: none"> 1. 10,000-gallon gasoline fueling tank. Speedy-dry was not available in the shed next to the fueling station at the time of the Audit; however, absorbent pads and speedy-dry were available inside the garage (SMO directed foreman to put some absorbent materials outside near fueling). 2. There is an underground ~550-gallon waste oil tank at the central garage. Town representatives stated that there is a tank monitoring system, and the tank is inspected by the Suffolk County Dept. of Health. 	7/9/2015
Construction Sites:			
NYR10X418	East End Hospice Construction Site on Meeting House Road	<ol style="list-style-type: none"> 1. The SMO conveyed the need to refresh the construction entrance to the project manager. She also noted silt fencing near the construction trailer that was in need of (minor) maintenance. Silt fencing was checked adjacent to Aspatuck Creek for sediment build-up. None was noted. 2. SWPPP was on site with contractor's 4-hr ESC training card. 3. Most recent inspection report on site was dated 6/25/15. The project manager stated that they would be getting a copy of the previous week's inspection report this week, and corrective actions identified during that inspection were already made. 4. A spill kit was on site. 	7/8/2015
NYR10R788	Oakland Farms Construction Site	<ol style="list-style-type: none"> 1. The SMO noted that the inlet protection was not installed per plan and was covered in sand (note that there is no off site drainage at this site – inlets drain to leaching pools). 	7/8/2015

Town of Southampton MS4 Audit
July 7, 2015 – July 9, 2015

		2. Inspection reports onsite since at least 2011. Last inspection dated 6/25/15. The SMO stated during the onsite visit that this site submitted notification of temporary stabilization and shutdown to reduce inspection frequency – those records are on file with the Town.	
NYR10Y792	Stern Residence Construction	1. Single family residence. Silt fencing was installed with good vegetative buffer on both sides. Transport of sediment offsite was not observed; however construction entrance was in need of refreshing. Catch basins immediately outside driveway drain to leaching pools.	7/9/2015
MS4 Outfalls:			
Mapped Outfall	Outfall 1	1. Two (2) 12" HDPE pipes identified at this location. Only one outfall is identified on the map, although the outfall data sheet specifies that there are two pipes at this location. The pipes may drain the same drainage structure, however this is unclear. No flow was observed at time of field visit. Pipes discharge to the Peconic River.	7/9/2015
Mapped Outfall	Outfall 4	1. One 12" HDPE pipe with connection to catch basin in street (Dam Trail). No flow was identified from the outfall. Sediment and leafy debris were observed in the catch basin at the time of the field visit. Pipe discharges to Reeves Bay trib. Culvert pipe draining pond to the south of the outfall (flowing).	7/9/2015
Mapped Outfall	Outfall 38	1. This outfall appears to be a blind connection somewhere between an inlet on Oak Drive and a pipe conveying Silverbrook pond to the north side of SR-24. Flowing, but no indicators of illicit discharges.	7/9/2015
Mapped Outfall	Outfall 2	1. Short 12" CMP conveying roadside drainage to brook. No flow identified at the time of the field visit. There is a 24" CMP next to this outfall that appears to be a culvert pipe.	7/9/2015
Mapped Outfall	Outfall 3	1. A 24" CMP was identified in accordance with the outfall data sheet; however, an upstream drainage structure	7/9/2015

Town of Southampton MS4 Audit
July 7, 2015 – July 9, 2015

		could not be identified. It was unclear what if anything was conveyed through this pipe. No flow or indicators of illicit discharges were identified.	
Mapped Outfall	Outfall 130	1. Road end outfall to Mecox Bay. No flow or indicators of illicit discharges.	7/9/2015
Mapped Outfall	Outfalls 131/132	1. Two inlets on north and south side of the road to culvert pipe (tributary to Mecox Bay). No flow or indicators of illicit discharges.	7/9/2015
Mapped Outfall	Outfall 133	1. Newlight Lane bubbler system. Swale and pipe to creek. No flow or indicators of illicit discharges.	7/9/2015

D. POTENTIAL NONCOMPLIANCE ITEMS

1. Part IV.A of the Permit states that all permittees under GP-0-10-002 must have prepared a SWMP Plan documenting modifications to their SWMP. While the Town provided EPA with a SWMP Plan dated January 2012, revised 2015, the SWMP Plan did not include the following required elements:
 - a. Part III.B.2.c of the Permit states that permittees shall modify their SWMP to meet the additional Part IX.C requirements to address pathogens as the POC for the portion of their storm sewershed in any of the pathogen-impaired watersheds (see Permit Appendices 7 and 9). Part IX.C.3 of the Permit requires permittees to develop, implement, and enforce a program to detect and eliminate discharges to the MS4 from on-site sanitary systems in areas where factors such as shallow groundwater, low infiltrative soils, historical on-site sanitary system failures, or proximity to pathogen-impaired waterbodies, indicate a reasonable likelihood of system discharge. For such areas, the program must include inspection of systems designed for less than 1,000 gpd (septic systems, cesspools, including any installed absorption fields) at a minimum frequency of once every five (5) years and, where necessary, maintenance and rehabilitation. Inspections shall be conducted in accordance with most current version of the EPA IDDE Guidance Manual¹. The program shall also include establishment of necessary legal authority for implementation and enforcement. At the time of the Audit, the Town had not developed or implemented an on-site sanitary system IDDE program that meets the requirements of Part IX.C.3 of the Permit.
 - b. Part III.B.2.d of the Permit states that permittees shall modify their SWMP to meet the additional Part IX.D requirements to address nitrogen as the POC for the portion of their storm sewershed in the Peconic Estuary Nitrogen Watershed (see Permit Appendix 8). Part IX.D.6 of the Permit requires permittees to develop a turf management practices and procedures policy that addresses the following:

¹ https://www3.epa.gov/npdes/pubs/idde_manualwithappendices.pdf

Town of Southampton MS4 Audit
July 7, 2015 – July 9, 2015

- i. procedures for proper fertilizer application on municipally-owned lands. The application of any Nitrogen-containing fertilizer shall only be allowed under the supervision of a Certified Crop Advisor or Certified Landscape Architect; and
- ii. the planting of native plant material to lessen the frequency of mowing and reduce the use of chemicals to control vegetation.

During the Audit, Town representatives stated that they apply fertilizer only on athletic fields and a select number of ornamental locations. Fertilizers may only be applied from April through October. Furthermore, one (1) baseball field in Iron Point Park is deliberately not fertilized by the Town due to its proximity to the Peconic River. While the Town has developed and implemented policies to limit fertilizer application in the Peconic Estuary watershed, it did not have a written policy at the time of the Audit that meets the requirements of Part IX.D of the Permit.

2. Part IV.D of the Permit requires that all permittees shall continue to fully implement their SWMP. At the time of the Audit, the Town was not fully implementing practices specified in the SWMP Plan (including appendices) as detailed below:
 - a. The SWMP Plan appendix document for MCMs 4 and 5 states that the Town provides its SWPPP Guidance Document, a separate stand-alone document, to construction project applicants, and tracks distribution of this document. At the time of the Audit, the Town was not utilizing this document as a method for educating construction site owner/operators, design engineers, etc. on construction stormwater requirements.
 - b. The SWMP Plan appendix document for MCMs 4 and 5 states that the Town will sign the MS4 SWPPP Acceptance Form only once certain conditions have been met, including that proof of erosion and sediment control required training has been provided for all listed construction site contractors working on the project. During the Audit, Town representatives stated that they ensure that operators have received erosion and sediment control training either at the pre-construction meeting (for subdivisions), or by checking that the 4-hour training card is kept in the construction trailer. Both methods occur after the Town has signed off on the MS4 Acceptance Form.
 - c. For MCM 5, the Town's SWMP Plan identifies operation and maintenance requirements for specific types of stormwater management practices. For each stormwater management practice listed, the SWMP Plan specifies the following inspection frequency: quarterly for the first two years from the date of installation, and two times per year thereafter, and within 48 hours after each major storm event. The Town was not implementing the inspection frequency in its SWMP Plan at Town-owned post-construction stormwater management practices at the time of the Audit. This is also discussed in Paragraph D.6 of this report, below.
3. Part IV.G of the Permit requires that all permittees must, through a signed certification statement, contract or agreement, provide adequate assurance that the third parties will

Town of Southampton MS4 Audit
July 7, 2015 – July 9, 2015

comply with permit requirements applicable to the work performed by the third party. Third parties conducting SWMP-related work on behalf of the Town include contractors used for highway repaving, drainage installation, as well as an outside consultant for SWPPP review (as needed). Third party certifications were not in place at the time of the Audit, in accordance with Part IV.G of the Permit.

4. During the Audit, the Town stated that it waits between 1.5 and 2 days since the last storm event before performing ORI inspections. The Town must wait for a period of at least 48 hours after a storm event to perform dry weather inspections, in accordance with Part VII.A.3.d of the Permit and the EPA IDDE Guidance Document.
5. Part VII.A.5.a.vi of the Permit requires all permittees to maintain an inventory of post-construction stormwater management practices within the permittee's jurisdiction. At a minimum, the inventory shall include practices discharging to the MS4 that have been installed since March 10, 2003, all practices owned by the MS4, and those practices found to cause or contribute to water quality standard violations. The inventory shall also include, at a minimum: location of practice (street address or coordinates); type of practice; maintenance needed per the NYS Stormwater Management Design Manual, SWPPP, or other provided documentation; and dates and type of maintenance performed.

At the time of the Audit, the Town had inventoried 115 infiltration basins and 1 open channel in GIS. The Town also had a list of 10 private sites with post-construction C&Rs in place dating back to 2008. According to the Town, none of the post-construction stormwater management practices governed by C&Rs flow to the Town's MS4. It was unclear at the time of the Audit how many post-construction practices included in the Town's GIS inventory had the potential to discharge to the Town's MS4, and whether they were all Town-owned. It was also unclear whether there were any private practices installed between March 10, 2003 and 2008 that discharge to the Town's MS4, which should be included in the Town's inventory but currently are not. Lastly, at the time of the Audit, the Town did not have its inventory in a format that includes all of the required information listed in Part VII.A.5.a.vi of the Permit.

6. Part VII.A.5.a.vii of the Permit requires all permittees to develop, implement and enforce a program that ensures adequate long-term operation and maintenance of management practices identified in Part VII.5.a.vi by trained staff, including inspections to ensure that practices are performing properly.

As previously mentioned, the Town's SWMP Plan states that stormwater management practices will be inspected quarterly for the first two years from the date of installation, and two times per year thereafter, and within 48 hours after each major storm event. At the time of the Audit, Town representatives stated that the Highway Department inspects and maintains the Town-owned infiltration basins, and estimated that approximately 10% are cleaned each year. The Town was not implementing the post-construction inspection program described in its SWMP Plan. Furthermore, although the Town stated that none of the private post-construction practices with C&Rs in place discharge to the MS4, the Town should have written procedures for how it will ensure future private practices that do

Town of Southampton MS4 Audit
July 7, 2015 – July 9, 2015

discharge to the MS4 are inspected and maintained in accordance with the C&Rs. Lastly, if the Town identifies private post-construction practices installed between March 10, 2003 and 2008 that discharge to its MS4, please identify how the Town will ensure they are inspected and maintained as required by Part VII.A.5.a.vii of the Permit.

7. Part VII.A.6.a.ii of the Permit requires that all permittees must at a minimum frequency of once every three (3) years, perform a self-assessment of all municipal operations addressed by the SWMP to: determine the sources of pollutants potentially generated by the permittee's operations and facilities, and identify the municipal operations and facilities that will be addressed by the pollution prevention and good housekeeping program, if it is not done already. At the time of the Audit, the Town had completed and documented self-assessments for approximately six (6) of its municipal facilities, yet had an inventory that included approximately 80 facilities (note that in numerous instances, multiple facilities are listed separately under the same address). During the Audit, it was discussed that the vast majority of the facilities on the Town's inventory drain to groundwater, and stormwater runoff from these facilities does not enter the Town's MS4; however, the Town had not maintained documentation demonstrating that self-assessments were performed to make this determination.
8. Part VII.A.6.a.vi of the Permit requires that all permittees develop and implement an employee pollution prevention and good housekeeping training program and ensures that staff receive and utilize training. Prior to the Audit, the Town provided EPA with a summary of stormwater training and meeting attendance over the past 5 years (2011 – 2015). EPA noted that most of the trainings and meetings were attended by department heads or management-level individuals, so it was unclear whether municipal staff received pollution prevention / good housekeeping training. Pollution prevention training on the staff level was not documented at the time of the Audit.

E. AREAS OF CONCERN AND RECOMMENDATIONS:

1. At the time of the Audit, Town representatives estimated that the Town has between 2,500 and 3,000 drainage structures (e.g., catch basins, leaching catch basins). Although structures within storm sewersheds were mapped, the exact number of drainage structures discharging to surface waters was not provided at the time of the Audit. The Highway Department Superintendent stated that approximately 600 structures are maintained by the Highway Department each year and that they target major roadways or known low spots as priority areas. EPA recommends that the Town takes storm sewershed boundaries into account when prioritizing drainage structure cleaning to ensure structures draining to surface waters are cleaned regularly and the discharge of associated pollutants is minimized. EPA also recommends that streets located within storm sewersheds draining to surface waters are considered for prioritized street sweeping.
2. At the time of the Audit, Town representatives stated that during routine road work (e.g., filling potholes, hot mix repairs, curbing, etc.) they do not utilize BMPs to prevent pollutants associated with road work from entering storm drains. It is recommended that the Town

Town of Southampton MS4 Audit
July 7, 2015 – July 9, 2015

develops and implements best management practices to prevent the discharge of pollutants to its MS4 during road construction/repair activities.

3. The following areas of concern were noted during the field portion of the Audit:
- a. Miscellaneous fuel/oil staining was observed on the ground at the 1524 North Sea Road site. Fuel/oil residues should be cleaned up in order to prevent the transport of pollutants to surface and/or ground water.
 - b. Hoses are available for rinsing boats at Conscience Point Park. While the Town indicated it had not experienced problems with people *washing* their boats, it is recommended that signage is installed to deter boaters from using soap.
 - c. At the maintenance garage located at 1370 Major Path, some petroleum products were stored on a spill pallet, whereas one (1) 55-gallon drum and miscellaneous gasoline cans were stored on the garage floor. All petroleum based products should be stored with secondary containment.
 - d. At 20 Jackson Avenue, there is one small circular floor drain in the shower room. The destination of the floor drain was not clear at the time of the Audit; however, the Highway Dept. Superintendent stated that he believed all floor drains were cemented shut prior to his time as superintendent. Please confirm.
 - e. Batteries were observed on the ground outside the highway garage at 20 Jackson Avenue. Batteries should be stored in a location where they are not exposed to stormwater.
 - f. One (1) drywell was observed outside the 20 Jackson Avenue facility. Storage in the vicinity of the drywell included a 900-gallon #2 heating oil tank, and 55-gallon drums stored on wooden pallets. The contents of the 55-gallon drums were not identified at the time of the Audit. Please confirm.
 - g. An uncovered scrap metal dumpster was observed near the northeast corner of the 20 Jackson Avenue property, near the animal shelter. It is recommended that the Town covers the scrap metal dumpster to prevent the transport of pollutants to groundwater.
 - h. A spill kit was not available near the fueling station at 32 Jackson Avenue at the time of the Audit.
 - i. At Outfall 1, two (2) 12" HDPE pipes were identified. While only one outfall is identified on the Town's outfall map, the accompanying outfall data sheet specifies that there are two pipes at this location. The pipes may drain the same drainage structure, however this is unclear. Please confirm.
 - j. At Outfall 4, sediment and leafy debris were observed in the upstream catch basin at the time of the field visit.

F. ATTACHMENTS:

- 1. Organizational Chart
- 2. Photograph Log
- 3. TOS Outfall Maps Identifying Outfalls Inspected during the Audit

TOWN OF SOUTHAMPTON

Departments at the Town Responsible for Implementation of the
Six Minimum Control Measures (MCM)
MS4 Coordinator – Town Engineer – C Fetten

MCM 1

PUBLIC EDUCATION

**Department of Municipal Works/
Engineering (DMW)**

(C Fetten) – Makes presentations at Community Advisory Committees, Table Top Presentations, integration into other areas of Best Management Practices. Prepares pamphlets, radio.

Citizens Response Center

(D Keller, C Jones) – Creates graphics and designs for presentations. Prepares postcards and mailers.

Sustainability Committee

Coordinates 2 Public Events per year in the area of Sustainability (Water Quality being largest interest), invites Guest speakers to Town. Works to distribute educational pamphlets, engage public.

Trustees

(E Warner Jr.) – Prepares and distributes information regarding native bluff plantings and water quality.

MCM 2

PUBLIC INVOLVEMENT

Department of Municipal Works

(C Fetten) – Makes presentations at Community Advisory Committees, coordinates efforts for Great East End Clean Up, STOP Days, works with Council Office on Community Garden, Plastic Bag Ban, and other education endeavors.

Supervisor and Council Office

Council Members provide education, outreach opportunities to go towards many environmental efforts. These most often include Stormwater Education, Outreach, and Involvement. Engaging public through working groups to encourage alternative septic systems to reduce nitrogen as a pollutant through open conversation of issues with Suffolk County Department of Health Services, and public programs and incentives to promote best management practices, such as recycling, waste management, community gardens, farmers markets and public education.

Sustainability Committee

Works to distribute pamphlets and engage public and Town Board to progress Water Quality Initiative.

Department of Land Management

Long Term Planning
(K Collins) – Public Hearings on Planning Initiatives, Water Protection Plan, different large developments in which Public Hearings include discussions and feedback on Environmental Issues.

MCM 3

ILLEGAL DISCHARGE DETECTION AND ELIMINATION

GIS

(M Baldwin) – Performs Mapping Functions. Assists and trains individuals using GPS. Maps data sets to assist in emergency management planning, potential program areas.

Dept. of Municipal Works/Engineering

(C Fetten) – Inspect outfalls, and field reconnaissance associated with regular inspections and potential illicit discharge violations. Works on Staff Training, performs inspections, recommends enforcement actions.

Code Enforcement Office

(C Fraser) – Receives calls regarding potential code violations and works on enforcement actions.

Town Attorney's Office

(R Harris) – Oversees violation processes and works on enforcement actions.

Highway Department

(A Gregor) – While performing routine maintenance, reports any potential ID violations. Trains staff to identify and report of potential IDs.

Police Department

(Capt. Schurek) – While performing operational duties, notifies staff if drains need to be protected in event of accidents.

Bay Constables

(A Tuzzolo) – Patrols Water Bodies and reinforces Town Trustee regulations.

Trustees

(E Warner Jr.) – Operates pump out boats of some Trustee owned roads.

MCM 4

CONSTRUCTION SITES

**Dept. of Municipal Works/
Engineering (CF)**

Coordinator – Town Engineer (C Fetten) – Receives "Request for Inspection by Highway Dept. Determination of Potential for Flooding" from land development agencies, and determine if project requires a SWPPP. This paperwork then goes to the Highway Department and back to the Dept. of Land Management, for review. Applicants can not receive building permits without the SWPPP Acceptance Form and Acknowledgement. DMW receives Site Plans/ Subdivision Applications from the Dept. of Land Management/ Planning Board for review and comment. Final approval not provided until SWPPP received, reviewed, accepted, and acknowledged by DEC. SWPPPs are reviewed and accepted by Engineers. Performs inspections on active construction sites. If issues, coordinate with other Departments to progress Notice of Violations, Stop Work Orders.

Town Attorney's Office

(C Benincasa) – Reviews covenants and restrictions associated with Post Construction Management. Works with enforcement issues, stop work orders and Notice of Violations.

Dept. of Land Management

(K Collins) – Reviews land development applications for environmental impact and low impact, works with developer to preserve areas of high slopes, wetlands, and other environmentally sensitive areas. Refers sites to the DMW for Construction SPDES, site plan review.

MCM 5

POST CONSTRUCTION MANAGEMENT

Dept. of Municipal Works/ Engineering

(C Fetten) – Reviews status of project as it progresses, Notice of Termination is not signed off by DMW until construction complete, certified, and all C&Rs received. Performs inspections and recommends communications, and if necessary enforcement activities if post construction not properly managed. Works to coordinate staff training on ongoing maintenance requirements.

Town Attorney's Office

(C Benincasa) – Reviews C&Rs. Works on any enforcement activities.

Community Preservation

(M Wilson) – Maintains priority preservation list and preserves land based on recommendations.

Dept. of Land Management

(K Collins) – Reviews land development and requires certain applications to implement buffers, open space areas, and conservation easements.

Code Enforcement Office

(C Fraser) – Work with DMW and Town Attorney's Office on enforcement actions.

MCM 6

GOOD HOUSEKEEPING

Dept. of Municipal Works

(C Fetten) – Engineering, Facilities, Waste Management, Intermodal Transportation, Central Garage (1 fueling station) – Implements best management practices for operational and capital improvements to facilities. Work on progressing staff training and coordinate working committee.

Highway Department

(A Gregor) – Maintains Highway Maintenance facilities including buildings, salt storage, certain fueling stations (4 fueling stations), Town roadways, drainage infrastructures.

Trustees (E Warner Jr.)

Maintains Trustee Owned roads, and the water bottoms. Performs maintenance on Trustee owned facilities. Maintains the Town Pump Out Boats.

Hampton Bays Water District

(R King) – Maintains the Hampton Bays Water supply infrastructure including 5 facilities, one of which includes a fueling station.

Parks Facilities Maintenance

(C Bean) – Maintains Park and all Recreation infrastructure and all Town of Southampton Public Facilities grounds.

Community Preservation

(M Wilson) – Generally maintains the CPE properties.

Southampton MS4 Audit Photograph Log

July 8 – 9, 2015



P7080002: Construction entrance noted as in need of refreshing at East End Hospice Construction Site



P7080003 – Silt fencing near construction trailer at East End Hospice construction site in need of minor maintenance



P7080004: Vegetative buffer next to silt fencing adjacent to Aspatuck Creek; sediment build-up or movement to waterway was not observed



P7080005: Inlet protection at Oakland Farms construction site not installed per design plan (and covered in sand); note that inlets at this site drain to leaching pools



P7080006: Additional photograph of an inlet at the Oakland Farms subdivision
(protection not installed per plan and covered in sand)



P7080008: Coal patch and recycled concrete piles at the 1524 North Sea Road Highway
Yard



P7080013: Four (4) 55-gallon drums on spill pallets located inside the garage at the
1524 North Sea Road site



P7080016: Staining on the ground next to Recycled Asphalt Product (RAP) pile at 1524
North Sea Road



P70800018: Additional staining on the ground at 1524 North Sea Road



P70800021: Drains to recharge basins at Conscience Point Park; no stormwater outfalls through the bulkhead to surface water were observed.



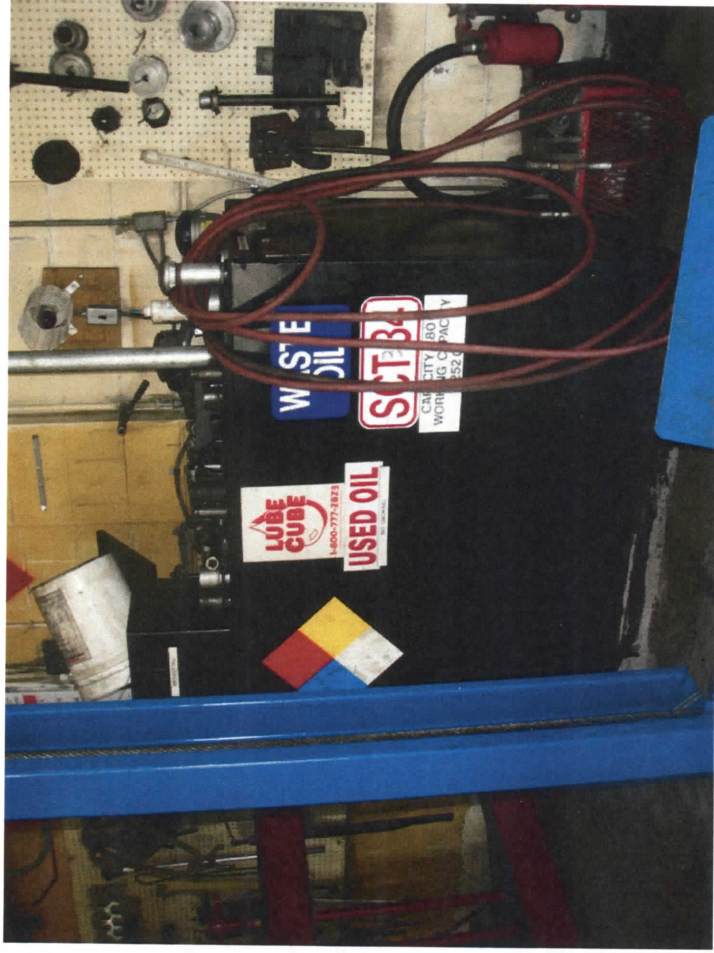
P7080024: Speedy dry in use under vehicle being maintained at the 1370 Major Path garage



P7080025: Some petroleum products stored on spill pallet, and others (55-gallon drum and gasoline containers) stored on the floor of the garage at 1370 Major Path



P7080031: Heavy vehicle maintenance bay at Jackson Avenue highway garage – pit drains to underground waste oil tank



P7080033: Above ground waste oil tank inside Jackson Avenue highway garage



P7080038: small floor drain in shower room at the Jackson Avenue highway garage – the destination of the drain was not known, although the Highway Dept. Superintendent stated all drains had been cemented shut prior to his arrival



P7080040: minor staining on ground / manhole cover outside the Jackson Avenue highway garage



P7080043: Batteries identified outside the Jackson Avenue highway garage



P7080046: 900-gallon #2 heating oil tank outside of the Jackson Avenue highway garage (background). 55-gallon drums on wooden pallets with unknown contents (foreground).



P7080047: 900-gallon #2 heating oil tank



P7080048: only drywell observed at the Jackson Avenue highway yard on the north side of the highway garage (near #2 heating oil tank)



P7080051: Aboveground 6000-gallon diesel and 1000-gallon gasoline tanks at the Jackson Avenue Highway Yard



P7080063: silt and sediment from sweeper washout pushed to the west side of the Jackson Avenue highway yard. Mulch appeared to have been recently applied to this area.



P7080064: Accumulated silt and sediment debris from sweeper washout on the west side of the Jackson Avenue highway yard (west side)



P7080065: Accumulated silt and sediment debris from sweeper washout on the west side of the Site.



P7080069: Mulched area of the western side of the Jackson Avenue highway yard (also identified in photograph P7080063) looking back towards center of the yard where sweepers are washed out.



P7080073: "Lagoon" at Jackson Avenue Highway Yard used to deposit wet material removed from catch basins



P7080074: Close-up of silt and sediment accumulation in lagoon used to deposit wet catch basin contents



P7090077: Outfall 1 (outfall data sheet indicates that there are 2 12" HDPE pipes here – both pipes may drain same drainage structure, but this is unclear). No flow at time of field visit.



P7090079: Drainage structures immediately upstream of Outfall 1 to Peconic River (shown)



P7090082: Dead fish observed in Peconic River near Outfall 1 location



P7090084: Catch basin upstream of Outfall 4



P7090088: Outfall 4 on right (no flow), culvert under Dam Trail on left (tidal, flowing)



P7090091: Inlet on Oak Drive believed to have blind connection to Outfall 38 across SR-24



P7090090: Sediment and leafy debris inside catch basin leading to Outfall 4



P7090092: Outfall 38, flowing (top right of photograph). This pipe conveys Silverbrook Pond to the north side of SR-24, however there appears to be a blind MS4 connection from Oak Drive. Outfall was hard to access due to woody vegetation.



P7090093: Area downstream of Outfall 38



P7090094: Outfall 2 on Silverbrook Drive (12" CMP on right collecting drainage from roadway). The 24" CMP on the left appeared to be a culvert pipe.



P7090098: Approximate location of Outfall 3. The outfall data sheet indicates that there is a 24" CMP from road into pond at this location. While a 24" CMP was identified, the upstream drainage structure was not.

